



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 1

JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

October 20, 1998

James Shafer, Remedial Project Manager  
U.S. Department of the Navy  
Naval Facilities Engineering Command  
Northern Division  
10 Industrial Highway  
Code 1823, Mail Stop 82  
Lester, PA 19113-2090

Re: Marine Human Health Risk Assessment Offshore Areas of the Former Robert E.  
Derecktor Shipyard

Dear Mr. Shafer:

EPA reviewed the *Marine Human Health Risk Assessment Offshore Areas of the Former Robert E. Derecktor Shipyard*, dated September 1998, for incorporation of responses to our comments dated July 28, 1998. All major problems relating to calculations, missing pathways, and changes in exposure factors have been incorporated in this version. Three format-related or terminology-related issues have not been addressed from the last round of comments (July 28, 1998) (see Attachment A). Further, we note that the question regarding whether the arsenic concentrations are naturally-occurring or site-related is unresolved until additional work is completed.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Derecktor Shipyard. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,



Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI  
Melissa Griffin, NETC, Newport, RI  
Jennifer Stump, Gannet Fleming, Harrisburg, PA  
Cindy Hanna, USEPA, Boston, MA  
Steven Parker, Tetra Tech-NUS, Wilmington, MA  
Mary Philcox, URI, Portsmouth, RI  
David Egan, TAG recipient, East Greenwich, RI

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
§ 6.0	Cancer risk and non-cancer hazard quotient equations have been added to Section 6.1. However, the calculated dose to which the receptors are exposed is referred to in these equations as the "Intake." This does not correspond to the terminology used in the exposure equations presented in Section 5.3. The terminology used for the exposure dose, whether it is referred to as the intake, the ingestion dose or the exposure dose, should be standardized between Chapters 5 and 6, or the text of Chapter 6 should define the term, "Intake."
p. 6-29, § 6.3	The requested summary table has not been added. The table was requested again in an e-mail message dated October 5, 1998. The inclusion of a summary table is not only helpful to the reader, but is useful for dissemination of public information. If the risk assessment results are not summarized, then the time consumption by each reader would greatly exceed the effort to include this fairly standard summary table. In addition, future risk assessment summary tables will be required according to the EPA's Risk Assessment Guidelines, Part D.
Appendix A	EPA's July 28, 1998 comments requested that data in this appendix be segregated by species ( <i>i.e.</i> , all hard clam samples grouped, all lobster samples grouped, <i>etc.</i> ) as was done in the draft (March 1998) version. This request was reiterated in an e-mail message dated October 5, 1998. Since the draft table included the information in the desirable format, please use the draft table to present the segregated information.